



FEB 26 2016

United States District Court  
Western District of New York

Honorable Frank P. Geraci, Jr.  
United States District Judge  
United States District Courthouse  
Rochester, New York 14614

Re: *Larry Pratt, et al. v. Loretta Lynch, et al.* | Case No. 15-CV-6765 FPG

Dear Judge Geraci:

I am a Trial Attorney with the U.S. Department of Justice, Civil Division, Federal Programs Branch, assigned to the above referenced matter. I have submitted my application with the clerk's office for a CM/ECF username and password and will be filing a Notice of Appearance in the case shortly. This action is brought by several plaintiffs represented by Paloma Capanna, Esq. alleging Constitutional violations by the United States.

The United States' answer in this matter is currently due on or about March 11, 2016. Although I and other counsel for the United States have been working diligently to meet the current deadline, previously imposed work obligations and travel plans have interfered with our ability to prepare a response by this date. I therefore write to request that the date to respond to Plaintiffs' complaint be extended to **March 25, 2016**. Ms. Capanna has graciously consented to the requested extension.

Should you have any questions about this matter, please do not hesitate to contact me. The Court's courtesies in this request are appreciated.

Very truly yours,

WILLIAM J. HOCHUL, JR.  
United States Attorney  
Western District of New York

By: s/ Nathan M. Swinton  
Nathan M. Swinton  
Trial Attorney

NMS/jmm

cc: Paloma Capanna, Esq.

SO ORDERED:

Hon. Frank P. Geraci, Jr.

Date

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February 26, 2016

